

County of Los Angeles DEPARTMENT OF CHILDREN AND FAMILY SERVICES

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November 12, 2013

To:

Supervisor Mark Ridley-Thomas, Chairman

Supervisor Gloria Molina Supervisor Zev Yaroslavsky Supervisor Don Knabe

Supervisor Michael D. Antonovich

From: Philip L. Browning

Director

CHILDREN'S INSTITUTE, INC. FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Children's Institute, Inc. Foster Family Agency (the FFA) in June 2013. The FFA has one licensed office in the Fourth Supervisorial District, and provides services to County of Los Angeles DCFS foster children and youth. According to the FFA's program statement, its mission is "to promote the well-being of vulnerable children by healing those harmed by abuse or neglect, helping families provide safe, nurturing homes and the resources their children need to thrive, and advancing innovative programs and policies that contribute to the welfare of children."

At the time of the review, the FFA supervised 34 DCFS placed children in 15 certified foster homes. The placed children's average length of placement was 6 months, and their average age was 8.

SUMMARY

During OHCMD's review, the interviewed children generally reported: feeling safe at the FFA; having been provided with good care and appropriate services; being comfortable in their environment and treated with respect and dignity. The certified foster parents reported they were supported by the FFA staff in their efforts to provide care, supervision and service delivery to the children placed in their homes.

The FFA was in full compliance with 4 of 10 applicable sections of our program compliance review: Health and Medical Needs; Personal Rights and Social and Emotional Well-Being; Discharged Children; and Personnel Records.

Each Supervisor November 12, 2013 Page 2

The Psychotropic Medications section was not applicable as no children placed at the time of the review were prescribed psychotropic medication.

OHCMD noted deficiencies in the areas of Licensure/Contract Requirements, related to a Community Care Licensing (CCL) citations; Certified Foster Homes, related to lack of documentation of safety inspections being conducted every six months for one certified foster home and one certified foster parent missing annual training hours; Facility and Environment, related to children not having access to a working computer; Maintenance of Required Documentation/Service Delivery, related to the Needs and Services Plans (NSPs) not addressing the children's progress toward NSP goals, Initial NSPs and Quarterly Reports not being comprehensive; Education and Workforce Readiness, related to one child's educational goals not being met and the child's academic performance had not increased; and Personal Needs and Economic Well-Being, related to one child not being given the opportunity to select her own clothing and children in one certified foster home for not having Life Books.

Attached are the details of our review.

REVIEW OF REPORT

On June 28, 2013, the DCFS OHCMD Monitor, Greta Walters, held an Exit Conference with the FFA representative, Lori de los Santos, Regional Director. The FFA's representative: agreed with the review findings and recommendations; was receptive to implementing systemic changes to improve their compliance with regulatory standards; and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor-Controller and CCL.

The FFA provided the attached approved CAP addressing the recommendations noted in this compliance report.

OHCMD will confirm that these recommendations have been implemented during our next monitoring review.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager, at (213) 351-5530.

PLB:EM:KR RDS:NF:gfw

Attachments

c: William T Fujioka, Chief Executive Officer
Wendy L. Watanabe, Auditor-Controller
Public Information Office
Audit Committee
Mary Emmons, Executive Director, Children's Institute, Inc. FFA
Angelica Lopez, Acting Regional Manager, Community Care Licensing

CHILDREN'S INSTITUTE, INC. FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY

4300 Long Beach Blvd., #700 Long Beach, CA 90807 License Numbers: 197805117

5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home (WFFH) Training 6. FFA Pays Certified Foster Parents (CFP) WFFH Required Supplemental Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of Two (2) or More Children II Certified Foster Homes (CFHs) (12 Elements) 1. Home Study and Safety Inspection Conducted Prior to Certification 2. Agency's inquiry with OHCMD for Historical Information Prior to Certification 3. Timely Criminal Clearances (DOJ, FBI, CACI) Prior to Certification 4. Timely, Completed, Signed Criminal Background Statement 5. Health Screening & TB Test Prior to Certification 6. All Required Training Prior to Certification 7. Certificate of Approval on File/Including Capacity 8. Safety Inspections Completed At Least Every Six Months or Per Approved Program Statement 9. Completed Annual Training Hours for Recertification and Current CPR/First-Aid/Water Safety Certificates 10. Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers, if Applicable Car Seat(s)		Contract Compliance Monitoring Review	Find	ings: June 2013
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	1	Current CDL/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and	10.	Full Compliance
Screening/CDL/CPR DOJ/FBI/CACI/Auto Insurance for Other Adults in the Home	1	1. Criminal Clearances and Health Screening/CDL/CPR DOJ/FBI/CACI/Auto	11.	Full Compliance
12. FFA Assists CFPs in Providing Transportation 12. Full Compliance Needs	1	2. FFA Assists CFPs in Providing Transportation	12.	Full Compliance

111	<u>Facilit</u>	ty and Environment (7 Elements)		-
	4. 5.	Exterior/Grounds Well Maintained Common Areas/Interior Well Maintained Children's Bedrooms/Interior Well Maintained Sufficient and Appropriate Educational Resources Adequate Perishable and Non-Perishable Food CFP Conducted Disaster Drills and Documentation Maintained Money and Clothing Allowance Logs Maintained	1. 2. 3. 4. 5. 6.	Full Compliance Full Compliance Full Compliance Improvement Needed Full Compliance Full Compliance
IV	Mainte	enance of Required Documentation/Service		
	Delive	ery (10 Elements)		
	1.	FFA Obtains or Documents Efforts to Obtain County Children's Social Worker's (CSW) Authorization to Implement NSPs	1.	Full Compliance
		CFPs Participated in Development of the NSPs	2. 3.	Full Compliance
	4.	Children Progressing Towards Meeting NSP Goals FFA Social Workers Develop Timely, Comprehensive Initial NSP with Child's Participation	4.	Improvement Needed Improvement Needed
	5.	FFA Social Workers Develop Timely, Comprehensive Updated NSPs with Child's Participation	5.	Full Compliance
	6.	Therapeutic Services Received	6.	Full Compliance
	7.	Recommended Assessments/Evaluations Implemented	7.	Full Compliance
	8.	County Children Social Workers Monthly Contacts Documented in Child's Case File	8.	Full Compliance
	9.	FFA Social Workers Develop Timely, Comprehensive Quarterly Reports	9.	Improvement Needed
	10.	FFA Social Workers Conduct Required Visits	10.	Full Compliance
V	Educa	tion and Workforce Readiness (5 Elements)		
	i	Children Enrolled in School within Three School Days	1.	Full Compliance
	1	Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals	2.	Improvement Needed
	1	Current Children's Report Cards/Progress Reports Maintained	3.	Improvement Needed
	4.	Children's Academic Performance and/or Attendance Increased	4.	Full Compliance
	I	FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs	5.	Full Compliance

VI	Healt	th and Medical Needs (4 Elements)	
	1. 2. 3. 4.	Initial Medical Exams Conducted Timely Follow-up Medical Exams Conducted Timely Initial Dental Exams Conducted Timely Follow-Up Dental Exams Conducted Timely	Full Compliance (ALL)
VII	Psyc	hotropic Medications (2 Elements)	
	1. 2.	Current Court Authorization for Administration of Psychotropic Medication Current Psychiatric Evaluation Review	Not Applicable (ALL)
VIII		onal Rights and Social Emotional Well-Being	
	(10 E	ilements)	
	1.	Children Informed of Agency's Policies and	Full Compliance (ALL)
	2.	Procedures Children Feel Safe in the CFP Home	
ļ	3.	CFPs' Efforts to Provide Nutritious Meals and	
	1	Snacks	
	4. 5.	CFPs Treat Children with Respect and Dignity Children Allowed Private Visits, Calls and to	9
	0.	Receive Correspondence	
	6.	Children Free to Attend or Not Attend Religious Services/Activities of Their Choices	
	7.	Children's Chores Reasonable	
	8.	Children Informed About Their Medication and	
	9.	Right to Refuse Medication Children Aware of Right to Refuse or Received	
	9.	Medical, Dental and Psychiatric Care	
	10.	Children Given Opportunities to Participate in Extra-Curricular Activities, Enrichment and Social Activities	
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IX	Pers	onal Needs/Survival and Economic Well-Being	
	_	ements)	
	`	,	
	1.	\$50 Clothing Allowance Provided in Accordance with FFA Program Statement	1. Full Compliance
	2.	Ongoing Clothing Inventories of Adequate Quantity and Quality	2. Full Compliance
	3.	Children's Involvement in Selection of Their	3. Improvement Needed
	4.	Clothing Provision of Sufficient Supply of Clean Towels and	4. Full Compliance
	_	Personal Care Items Meeting Ethnic Needs	5 Full Compliance
	5.	Minimum Weekly Monetary Allowances	5. Full Compliance
	6.	Management of Allowance/Earnings	6. Full Compliance
	7.	Encouragement/Assistance with Life Book/Photo Album	7. Improvement Needed
X	Discl	narged Children (3 Elements)	
	1.	Completed Discharge Summary	1. Full Compliance
	2.	Attempts to Stabilize Children's Placement	2. Full Compliance
	3.	Child Completed High School (if applicable)	3. Not Applicable
	ა.	Child Completed High School (ii applicable)	3. Not Applicable
XI	Pers	onnel Records (9 Elements)	
	1.	Criminal Clearances (DOJ, FBI, CACI) Signed and Submitted Timely	Full Compliance (ALL)
	2.	Timely, Completed, Signed Criminal Background Statement	
	3.	FFA Social Workers Met Education/Experience Requirements	
	4.	Timely Employee Health Screening/TB Clearances	
	5.	Valid CDL and Auto Insurance	
	6.	FFA Employees Signed Copies of FFA Policies	
	5.	and Procedures	
	7.	FFA Employees Completed All Required Training	
	'`	and Documentation Maintained	
	8.	FFA Social Workers Have Appropriate Caseload	
		Ratio	
	9.	FFA Maintained Written Declarations for Part-Time	
		Contracted FFA Social Workers Caseloads not to	
		Exceed Total of 15 Children	

CHILDREN'S INSTITUTE, INC. FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW FISCAL YEAR 2012-2013

SCOPE OF REVIEW

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the June 2013 review. The purpose of this review was to assess Children's Institute, Inc. Foster Family Agency's (the FFA's) compliance with the County contract and State regulations and included a review of the FFA's program statement, as well as administrative internal policies and procedures. The monitoring review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment.
- Maintenance of Required Documentation and Service Delivery,
- Educational and Workforce Readiness.
- Health and Medical Needs.
- Psychotropic Medication,
- Personal Rights and Social Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For purposes of this review, six children were selected for the sample. The Out-of-Home Care Management Division (OHCMD) interviewed six children and reviewed their case files to assess the care and services they received. Additionally, four discharged children's files were also reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, no placed children were prescribed psychotropic medication.

OHCMD reviewed two certified foster parent files and five staff files for compliance with Title 22 Regulations and County contract requirements. Interviews were conducted with two certified foster parents to assess the quality of care and supervision provided to the children.

CONTRACTUAL COMPLIANCE

OHCMD found the following six areas to be out of compliance.

Licensure/Contract Requirements

 Community Care Licensing (CCL) cited the FFA as a result of deficiencies and findings during the investigation of a CCL complaint. According to the complaint report dated December 29, 2012, CCL cited the FFA for Personal Rights violations due to one child not receiving the required weekly allowance from the certified foster parent, the child did not

receive adequate healthy food, or sufficient clothing as the child only had one school uniform which was washed every other day. The FFA submitted a Plan of Correction (POC) to CCL that included decertifying the certified foster parent to their CCL Licensing Program Analyst (LPA) which was approved. A referral to the Department of Children and Family Services (DCFS) Child Abuse Protection Hotline was made alleging General Neglect by the certified foster parent. The matter was investigated and "substantiated" by the DCFS Emergency Response Command Post and the Out-of-Home Care Investigations Section. The children were replaced and the certified foster home was placed on Indefinite Hold and will no longer be used as a placement resource for DCFS children.

Recommendation

The FFA's management shall ensure that:

1. The FFA is in full compliance with Title 22 Regulations, free of CCL citations.

Certified Foster Homes

• Documentation of a safety inspection having been conducted every six months was missing for one certified foster home. Another certified foster parent was missing annual training hours. During the Exit Conference, the FFA's Program Director stated that the FFA would now complete safety inspections of the certified foster homes on a quarterly basis and as to training hours for the certified foster parents, the FFA would emphasize the importance of completing annual training with the certified foster parents. Further, during supervision, the areas of safety inspections and certified foster parent training would be addressed with the FFA Social Workers and retraining of the FFA Social Worker would be conducted.

Recommendation

The FFA's management shall ensure that:

- 2. Safety inspections are completed at least every six months.
- 3. Certified foster parents complete annual training hours.

Facility and Environment

• The children in the one certified foster home visited did not have access to a working computer.

During the Exit Conference, the FFA's Regional Director reported that the FFA will develop a plan for the children to have access to a computer to complete school assignments and homework.

Recommendation

4. Children have access to educational resources and supplies.

Maintenance of Required Documentation/Service Delivery

- The progress towards meeting the goals of the Needs and Services Plans (NSPs) was not documented for five of the children.
- The Initial NSPs for two children were not comprehensive and did not include all elements in accordance with the NSP template.
- The NSP Quarterly Reports for five children were not comprehensive.

During the Exit Conference, the FFA's Regional Director stated that the NSPs would be discussed during the FFA Social Worker's supervision and retraining would be provided to the FFA Social Workers. In addition, the FFA Supervisors, when reviewing the Quarterly Reports will be required to review previous Quarterly Reports to prevent duplication.

It should be noted that the FFA's representatives did not attend the OHCMD's NSP training for providers on January 20, 2012 or the NSP refresher training on August 1, 2013. All of the NSPs were developed after the training. During the review process, the OHCMD addressed the NSP deficiencies and Specific, Measurable, Attainable, Results Oriented and Time-Limited (SMART) goals with the FFA's Regional Director.

Recommendations

The FFA's management shall ensure that:

- 5. Children's progress towards NSP goals is documented.
- 6. Initial NSPs are comprehensive and include all elements in accordance with the NSP template.
- 7. NSP Quarterly Reports are completed in a timely manner.

Education and Workforce Readiness

- The FFA was not facilitating the educational goals for one child. The child was not receiving any resource services.
- One child is doing poorly in school and was in danger of failing three out six classes.

During the Exit Conference, the FFA's Regional Director stated that the FFA Social Workers would routinely assess the children's educational needs during weekly visits with children and the certified foster parents. Additionally, the FFA Supervisors would assist the FFA Social Workers in addressing issues which may prevent educational goals from being met.

Recommendations

The FFA's management shall ensure that:

- 8. They facilitate meeting educational goals of each child.
- 9. Services are provided to improve the children's academic performance.

Personal Needs and Social/Economic Well-Being

- One child reported that she was not given the opportunity to select her own clothes.
- Three of the reviewed children did not have a Life Book/Photo Album.

During the Exit Conference, the FFA's Regional Director stated that the FFA will address Title 22 regulations as it relates to clothing during the certified foster parents' training. Also, as follow-up, the FFA Social Worker will actually ask the certified foster parents to see the Life Books.

Recommendations

The FFA's management shall ensure that:

- 10. Age-appropriate children are involved in the selection of their clothing.
- 11. All children are encouraged and assisted in updating a Life Book/Photo Album.

PRIOR YEAR FOLLOW-UP FROM DCFS OHCMD'S FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING REVIEW

The OHCMD's last compliance report dated September 4, 2012, identified nine recommendations.

Results

Based on OHCMD follow-up, the FFA fully implemented 5 of 9 previous recommendations for which they were to ensure that:

- Age-appropriate children are included in the development of the NSPs.
- Certified foster parents are included in the development of the NSPs.
- Updated NSPs are completed in a timely manner.
- Updated NSPs are comprehensive and include all required elements.
- All employees have documentation of initial training.

Four recommendations were not fully implemented:

- Children are assisted in making progress towards NSP goals.
- Initial NSPs are comprehensive and include all required elements.
- All efforts are made to assist children in increasing their academic progress.
- All foster children are encouraged and/or assisted in maintaining a Life Book/Photo Album.

Recommendation

The FFA's management shall ensure that:

The outstanding recommendations from the 2011–2012 monitoring report dated September 4, 2012, which are noted in this report as Recommendations 5, 6, 9 and 11, are fully implemented.

At the Exit Conference, the FFA representative stated the FFA would work to remain in compliance with all Title 22 Regulations and Contract requirements. To ensure compliance, the FFA would utilize the supervision between the FFA Supervisors and FFA Social Workers and provide additional training to the certified foster parents.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER (A-C)

A fiscal review of the FFA has not been posted by the A-C.



Findings and Recommendations Foster Family Agency Monitoring Review Field Exit Summary June 28, 2013 Plan of Corrections

July 26, 2013

Nestor Figueroa, MSW, Manager, CSA II
Out-of-Home Care Management Division
Department of Children and Family Services
9320 Telstar Ave., Ste. 216, El Monte, CA 91731

Dear Mr. Figueroa:

Subject: Findings and Recommendations – Foster Family Agency Monitoring Review Field Exit Summary, Revised July 9, 2013.

Regarding Out-of-Home Care Section (OHCS) findings and recommendations relating to the Foster Family Agency Monitoring Review Field Exit Summary completed on 6/28/13, Children's Institute, Inc. (CII) is submitting the following Corrective Action Plan:

Concern Area 1:

I. LICENSURE/CONTRACT REQUIREMENTS

4. Is the agency free of substantiated Community Care Licensing complaints' reports on safety and physical plant deficiencies since the last review? (SAFETY)

Corrective Action Plan Area 1:

4. As per certification policies and procedures, CII provides initial and ongoing training on Title 22 requirements as they relate to, but not limited to, Health and Safety. CII will take the appropriate action, i.e. removal of children, holds on placements, Correction Action Plans, decertification, in the cases of allegations and/or substantiated Community Care Licensing (CCL) complaints' reports against certified foster parents. Actions will be determined through consultation with CCL and DCFS staff as to the best course of action for a given allegation and/or substantiated complaint.

Concern Area 2:

II. CERTIFIED FOSTER HOMES

- 15. Were safety inspections completed at least every six months or per the timelines approved in the agency's Program Statement? (SAFETY)
- 16. Have foster parents completed the required additional annual training of 12 hours during the first year and 15 hours every year thereafter, as well as CPR, First-Aid and Water Safety certificates (if applicable)? (SAFETY)

"No training hours for [CFP]."

Corrective Action Plan Area 2:

- 15. CII's policy requires its staff to conduct safety inspections quarterly. CII will ensure that safety inspections are completed on a quarterly basis by implementing a tracking system and follow up of due dates and completion dates. Agency Social Workers (ASWs) will complete the safety inspections. The inspections will be part of the FFA Supervisor's monthly Quality Assurance checklist.
- 16. CII will ensure that all persons named as a Certified Foster Parent (CFP) on the Certificate of Approval complete all required training hours within the required timeframe. CII will continue to monitor training hours on a monthly basis. ASWs will follow up with CFP's on a monthly basis during home visits, phone calls and/or letters. CFP's who have not completed their training hours will be placed on a CAP and no new placements until training hours are up-to-date based on a pro-rated timetable (i.e. 4 during the first quarter, 8 during the second quarter, 12 during the third quarter and fifteen by the end of the year). Continued non-compliance may warrant de-certification. FFA Supervisor will monitor compliance on a monthly basis.

Concern Area 3:

III. FACILITY AND ENVIRONMENT

23. Does the certified foster home maintain sufficient and an appropriate selection of (quantity and quality) reading materials and educational resources and supplies, including computers, which are age-appropriate, readily available to children, and in good repair? (SELF-SUFFICIENCY)

"Children [in one CFP home] do not have access to a computer."

Corrective Action Plan Area 3:

23. CII will ensure that all children who are placed in CII foster homes are provided access to computers either in the home or through facilities such as libraries and schools. CFP will provide transportation to facilities as needed.

Concern Area 4:

IV. MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

- 29. Are the placed children progressing toward meeting the NSPs case goals (initial and updated)? (review agency's documentation of their efforts) (WELL-BEING)
- 30. Did the FFA social worker develop timely, comprehensive, initial (NSPs) with the participation of the developmentally age-appropriate child? (WELL-BEING)
- 32. When applicable, are children receiving necessary therapeutic services? (i.e. individual, Group therapy, substance abuse counseling, etc.) (WELL-BEING) 35. Does the FFA social worker complete timely, comprehensive, quarterly reports (to County workers by 10th business days following the end of each quarter from the date the child was placed). (WELL-BEING)

"Goals not modified in a CFP home, goals duplicated."

Corrective Action Plan Area 4:

29. Staff, ASWs and FFA supervisor, have been trained on developing goals and objectives to ensure adherence to the principles of SMART goals, Specific, Measurable, Attainable, Results Oriented (as well as Reasonable) and Time-limited. Ongoing review of goals and objectives will be part of the FFA Supervisor's weekly individual supervision with ASWs. The Domains of the goals will be comprehensive, including the areas of cognitive/academics, behavior, emotional/psychological, mental, physical (medical and dental), independent living skills and overall development.

The goals will be monitored and modified accordingly. They will reflect progress and/or challenges/problems that have been identified in weekly visit logs and through contact with foster parents, school staff, mental health providers and other service providers and community members. Per this RD's discussion with OHCS Monitor, the goal of reviewing a child's physical well-being in order to continue his/her good health will not be part of the ASWs repeated monitoring on the Quarterly reports and updated NSP's. Only difficulties and problems will be addressed in the NSP's and Quarterlies. The FFA Supervisor will ensure set goals are monitored and modified accordingly in respect to a child's needs and progress.

- 30. All treatment goals will be developed in collaboration with the child, as is age appropriate, and foster parent. This will be noted by the ASW in the corresponding visit log as well as by the child's and foster parent's signatures on the NSPs and quarterlies.
- 32. In developing an NSP for each child, the ASW will identify and address mental health and/or behavioral concerns as part of the plan. Goals and objectives will include therapeutic services that address the concerns accordingly. Referrals will be made and followed up by ASW to ensure that services are accessed. ASW will monitor participation in services and progress towards goals during home visits. This will be reflected in progress notes and in quarterlies and updated NSPs.
- 35. DCFS CSWs will be contacted monthly by child's ASW to ensure appropriate collaboration and updating of child's information. This will be noted in the Contact form in the respective child's file. This will be monitored quarterly in supervision by FFA supervisor as well as periodically by CII's Quality Assurance staff.

The NSP and quarterlies will be completed and submitted to DCFS one week before the due date. This will be monitored by the FFA supervisor as well as by CII's Quality Assurance staff.

Concern Area 5:

V. EDUCATION AND WORKFORCE READINESS

38. Does the FFA ensure the child attend school as required and facilitate in meeting the child's educational goals (e.g. IEP conference, tutoring, parent/teacher conference, homework, etc.), if applicable for children placed over 90 days? (WELL-BEING) 40. Based on the services provided by the FFA, has the child's academic performance and/or attendance increased e.g. improved grades, test scores, promotion to the next level, H.S. grad, IEP goals)? (WELL-BEING)

"[Children in a CFP home] were placed during summer break. [One child] does not [have] current IEP. Not receiving tutorial services."

Corrective Action Plan Area 5:

38. A new IEP was requested by CFP in September 2012, however, biological mother has Education Rights. CFP and CSW attempted to obtain mother's approval. Mother attended the scheduled IEP on May 13, 2013, giving her approval at that time. At the time of the Annual Review, foster mother was in the process of obtaining a copy of the IEP. It has since been received (see attached).

Although child is currently on summer break, CII will ensure that the recommendations as outlined by the IEP will be implemented. This will be reflected in the NSP. Child's

progress will be monitored and documented throughout ASW's weekly visits and on subsequent NSP. Her goals will be modified accordingly.

It is CII's policy that IEP's and all educational needs of the children in CII's foster care are identified and met within a timely manner. ASW's will continually assess for educational needs during weekly visits with the child and meetings with his/her CFP. FFA Supervisor will assist ASW in addressing challenges and obstacles that may prevent educational needs being met. The efforts to resolve the difficulties will be tracked and documented on contact notes and on NSPs/Quarterlies accordingly.

Concern Area 6:

IX. PERSONAL NEEDS/SURVIVAL AND ECONOMIC WELL-BEING

- 60. Are children, appropriate to their developmental level, involved in the selection of their clothing? (SELF-SUFFICIENCY)
- 64. Does the certified foster parent encourage and assist children to update a life book or a photo album? (PERMANENCY)

"[A foster child] reports that CFP buys her clothes."

"The children in [CFP's] home do not [have] life books. Children report that CFP is holding their allowance for trip to Vegas."

Corrective Action Plan Area 6:

60. Foster mother stated her concern over foster child's tendency to choose clothing that is inappropriate. Foster mother has been coached by ASW in allowing child to make appropriate choices, setting parameters from which child can select clothing.
64. All foster children/youth placed in the care of CII will receive a life book and/or photo album within 30 days of placement. All children/youth currently placed will immediately be given a life book/and or photo album by CII. Further, ASWs will ensure that the life book/photo album is regularly updated by reviewing each book/album, at the least, on a monthly basis, if not on a weekly basis. During supervision, on a monthly basis, the FFA supervisor will monitor ASWs documentation to ensure follow up of CII's policies regarding life books and/or photo albums.

This plan is respectfully submitted to you for your review to ensure that the Corrective Actions noted above have adequately addressed your concerns.

If you have any questions or concerns, please contact me at 310-783-4677, extension 5242. Thank you for your consideration on these matters.

Sincerely,

Sincerely,

Lori de los Santos, Psy.D.

Regional Director

Clinical Services, Region 8, Long Beach

Jacqueline Atkins, Ph.D.

Vice President of Programs

Region 8